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SEALED

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PRESTON CARR,

Defendant.

INDICTMENT

COUNTS 1-16: 18 U.S.C. § 1343
(Wire Fraud)

COUNT 17: 18 U.S.C. § 1957
(Money Laundering)

Case: 2:23-cr-00455
Assigned To : Nielson, Howard C., Jr
Assign. Date : 12/12/2023
Description: USA v. Carr

The Grand Jury charges:

BACKGROUND

At all times relevant to this Indictment:

1. Preston CARR is a resident of Stansbury, Utah.
2. From February 2003 to October 2019, CARR worked as a materials specialist for Intermountain Homecare and Hospice (IHC) in the State of Utah. In that position, CARR was responsible for managing the inventory of supplies at IHC's warehouse, including ordering items

from vendors and sending items out to IHC's clinics and hospitals.

SCHEME AND ARTIFICE TO DEFRAUD

3. Beginning in or about 2014, and continuing until on or about October 7, 2019, in the District of Utah, CARR knowingly devised and intended to devise a scheme and artifice to defraud his employer, and to obtain money and property by means of false and fraudulent pretenses, representations, promises, and omissions of material facts.

4. It was a part of the scheme and artifice to defraud that CARR used his position to steal infant formula and CPAP masks from IHC, which items he then sold for his own personal benefit.

5. From 2014 to 2019, CARR's gross proceeds from the scheme totaled approximately \$1,449,275.63. CARR used the proceeds from the scheme for his own personal benefit, to include payments for vehicles, property, comic books, and travel.

MANNER AND MEANS

6. In execution and furtherance of the scheme and artifice to defraud, CARR employed the following manner and means:

7. Beginning in or about 2014, and continuing until on or about October 7, 2019, CARR used his position at IHC to order excess inventory – typically infant formula and CPAP masks. Once the excess inventory arrived at IHC, CARR stole the excess product and resold it online and elsewhere. CARR then omitted the stolen product from IHC's inventory records to avoid detection. CARR received payment via PayPal for the stolen products. Throughout this process, CARR used, and caused to be used, interstate wire communications, in violation of 18 U.S.C. § 1343 (Wire Fraud).

COUNTS 1-16
18 U.S.C. § 1343
(Wire Fraud)

8. The allegations set forth above are incorporated herein by reference and realleged as though fully set forth herein.

9. On or about the dates listed below, in the District of Utah and elsewhere,

PRESTON CARR,

defendant herein, having devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and omissions of material facts, for the purpose of executing the scheme and artifice to defraud, did cause to be transmitted by means of interstate wire communications: to wit, credit card payments for the stolen products sent to defendant's PayPal account, including sixteen transactions as listed below:

Count	Date (on or about)	Interstate Wire Transaction
1	1/17/2019	\$5200.00 instant payment received via PayPal
2	1/30/2019	\$7944.00 instant payment received via PayPal
3	2/11/2019	\$5208.00 instant payment received via PayPal
4	3/12/2019	\$8428.00 instant payment received via PayPal
5	3/19/2019	\$6500.00 instant payment received via PayPal

6	3/27/2019	\$6480.00 instant payment received via PayPal
7	4/29/2019	\$8430.00 instant payment received via PayPal
8	5/7/2019	\$5968.00 instant payment received via PayPal
9	5/20/2019	\$5656.00 instant payment received via PayPal
10	5/29/2019	\$5122.00 instant payment received via PayPal
11	6/10/2019	\$6440.00 instant payment received via PayPal
12	6/23/2019	\$5274.00 instant payment received via PayPal
13	6/25/2019	\$6394.00 instant payment received via PayPal
14	7/4/2019	\$5460.00 instant payment received via PayPal
15	7/19/2019	\$5040.00 instant payment received via PayPal
16	8/21/2019	\$5486.00 instant payment received via PayPal

All in violation of 18 U.S.C. § 1343.

COUNT 17
18 U.S.C. § 1957
(Money Laundering)

10. The allegations set forth above are incorporated herein by reference and realleged as though fully set forth herein.

11. On or about the date listed below, in the District of Utah and elsewhere,

PRESTON CARR,

defendant herein, did knowingly engage and attempt to engage in the following monetary transactions in criminally derived property of a value greater than \$10,000.00, that were derived from a specified unlawful activity constituting a violation of 18 U.S.C. § 1343, in instances including but not limited to:

Count	Date	Monetary Transaction
17	1/19/2019	Payment with \$20,000 Mountain America Credit Union cashier's check and \$11,000 Chase Bank cashier's check for purchase of 2019 Jaguar

All in violation of 18 U.S.C. § 1957.

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense in violation of 18 U.S.C. § 1343, as set forth in this Indictment, the defendant shall forfeit to the United States of America all property, real or personal, that constitutes or is derived from proceeds traceable to the scheme to defraud. The property to be forfeited includes, but is not limited to, the following:

- 2016 Toyota Camry, VIN: 4T1BF1FK1GU265272.
- 2019 Jaguar E-PACE, VIN: SADFM2GX0K1Z42547.
- Real property located at 464 Winchester Drive, Stansbury Park, Utah.
- Comic books and collectibles purchased from PayPal account number ending in 3702.

- Money judgment equal to the value of all property not available for forfeiture as a result of any act or omission of the defendant for one or more of the reasons listed in 21 U.S.C. § 853(p).
- Substitute property as allowed by 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p).

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. § 1957, the defendant shall forfeit to the United States of America any property, real or personal, involved in such violations, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- 2019 Jaguar E-PACE, VIN: SADFM2GX0K1Z42547.
- Money judgment equal to the value of all property not available for forfeiture as a result of any act or omission of the defendant for one or more of the reasons listed in 21 U.S.C. § 853(p).
- Substitute property as allowed by 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p).

A TRUE BILL:

151
FOREPERSON OF GRAND JURY

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